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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

D.S., a minor by and through his
guardian ad litem Elsa Acosta,
individually and as successor-in-interest
to William Salgado; C.S., a minor by
and through his guardian ad litem Elsa
Acosta, individually and as successor-
in-interest to William Salgado; J.S., a
minor by and through her guardian ad
litem Elsa Acosta, individually and as
successor-in-interest to William
Salgado; M.S., a minor by and through
her guardian ad litem Elsa Acosta,
individually and as successor-in-interest
to William Salgado,

**Case No. 2:23-cv-09412-CBM-AGR
(Consolidated with Case No. 2:24-cv-
04898-CBM-AGR)**

*District Judge Consuelo B. Marshall
Magistrate Judge Alicia G. Rosenberg*

**STIPULATION TO DISMISS
CONSOLIDATED ACTIONS WITH
PREJUDICE**

[Fed. R. Civ. P. 41(a)(1)(A)(ii)]

*[Proposed Order filed concurrently
herewith]*

1 Plaintiffs,

2 v.

3 CITY OF HUNTINGTON PARK;
4 NICK NICHOLS; RENE REZA;
5 MATTHEW RINCON; APRIL
6 WHEELER; and DOES 5 through 10,
 inclusive,

7 Defendants.

8 WILLIAM OMAR CASTILLO
9 MIRANDA, an individual and as
10 Successor in Interest for Decedent,
11 WILLIAM RENE SALGADO
12 MIRANDA; JUANA MARIA
13 MIRANDA, an individual and as
14 Successor in Interest for Decedent,
15 WILLIAM RENE SALGADO
16 MIRANDA; OSMAR ANTONIO
17 CASTILLO BLANDON, a minor by
18 and through Guardian ad litem,
19 EUGENIA GUADELUPE ESPINOZA
20 SALMERON; EUGENIA
21 GUADELUPE ESPINOZA
22 SALMERON, an individual; KARLA
23 VANESSA BLANDON, an individual,

24 Plaintiffs,

25 v.

26 CITY OF HUNTINGTON PARK;
27 RENE REZA, an individual; APRIL
28 WHEELER, an individual; MATTHEW
 RINCON, an individual; NICK
 NICHOLS, an individual; JOSE A.
 YAMASAKI, an individual; SAUL
 RODRIGUEZ, an individual; and
 DOES 1 TO 10, inclusive,

 Defendants.

TO THE HONORABLE COURT:

IT IS HEREBY STIPULATED BY AND BETWEEN Plaintiffs D.S., C.S., J.S., and M.S. (“*Salgado* Plaintiffs”); Plaintiffs William Omar Castillo Miranda, Juana Maria Miranda, Osmar Antonio Castillo Blandon, Eugenia Guadalupe Espinoza Salmeron, and Karla Vanessa Blandon (“*Miranda* Plaintiffs”); and Defendants City of Huntington Park, Rene Reza, April Wheeler, Matthew Rincon, Nick Nichols, Jose A. Yamasaki, and Saul Rodriguez (“Defendants”), by and through their respective attorneys of record, that the above-captioned consolidated actions (Case No. 2:23-cv-09412-CBM-AGR and Case No. 2:24-cv-04898-CBM-AGR) both be and hereby are dismissed in their entirety, with prejudice, with each party to bear its own costs and attorneys’ fees, pursuant to Federal Rules of Civil Procedure, Rule 41(a)(1)(A)(ii). The parties further stipulate and respectfully request that the Court vacate all currently scheduled dates and deadlines in these actions.

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1 **IT IS SO STIPULATED.**

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3 DATED: September 24, 2025

LAW OFFICES OF DALE K. GALIPO

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5 By: /s/ Benjamin S. Levine

Dale K. Galipo

6 Benjamin S. Levine¹

7 *Attorneys for Plaintiffs D.S., C.S.,*
8 *J.S., and M.S.*

9 DATED: September 24, 2025

CARRAZCO LAW, A.P.C.

10
11 By: /s/ Kent M. Henderson

Angel Carrazco, Jr.

12 Kent M. Henderson

13 Christopher L. Holm

Attorneys for Plaintiffs William Omar

14 *Castillo Miranda, Juana Maria*

Miranda, Osmar Antonio Castillo

15 *Blandon, Eugenia Guadalupe Espinoza*

16 *Salmeron, and Karla Vanessa Blandon*

17 DATED: September 24, 2025

WOODRUFF & SMART

18
19 By: /s/ Caroline A. Byrne

Caroline A. Byrne

20 Brian A. Moore

21 Roberta A. Kraus

22 *Attorneys for Defendants*

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27 ¹ Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all
28 other signatories listed, and on whose behalf the filing is submitted, concur in the
filing's content and have authorized the filing.